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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BRUCE DUNN, MICHAEL WEISSMAN AND
JAMES VERRASTER,

Plaintiffs,

-against-

STANDARD BANK LONDON LTD., AND
STANDARD INTERNATIONAL HOLDINGS,

Defendants.

Index No. 05 CV 2749

Electronically Filed

**DEFENDANTS' NOTICE OF MOTION AND
MOTION TO DISMISS THE SECOND AMENDED COMPLAINT**

Notice of Motion

PLEASE TAKE NOTICE that, pursuant to Rule 12(b) of the Federal Rules of Civil Procedure ("Fed. R. Civ. P."), and upon the accompanying Memorandum of Law and Declaration of Maral N. Kazanjian in support thereof, Defendants Standard Bank London Ltd. ("Standard Bank London"), and Standard International Holdings ("Standard International") (collectively, "Defendants") will move this Court before the Honorable Denise Cote, United States District Court Judge, Southern District of New York, on a date and time to be designated by the Court or as soon thereafter as counsel may be heard, at the United States Courthouse for

the Southern District of New York, 500 Pearl Street, Courtroom 11B, New York, NY, 10007, for an Order granting Defendants' Motion to Dismiss the Second Amended Complaint.


Motion to Dismiss the Complaint

Plaintiffs Bruce Dunn, Michael Weissman and James Verraster (collectively "Plaintiffs") filed an action alleging violations of Article 6 of the New York Labor Law, breach of contract, unjust enrichment, and conversion. Defendants move to dismiss Plaintiffs' claims on the grounds that Plaintiffs have: (1) failed to state a cause of action upon which relief may be granted pursuant to Fed. R. Civ. P. 12(b)(6); and (2) failed to name an indispensable party under Fed. R. Civ. P. 12(b)(7).

Dated: New York, New York
August 5, 2005

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

By: 
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